

From: [MCCLINCY Matt](#)
To: [Sean Sheldrake/R10/USEPA/US@EPA](#)
Cc: [Kristine Koch/R10/USEPA/US@EPA](#); [ANDERSON Jim M](#); [ROICK Tom](#); [Eric Blischke/R10/USEPA/US@EPA](#); [Chip Humphrey/R10/USEPA/US@EPA](#)
Subject: FW: Arkema Quarterly Report and Response to JSCS Comments
Date: 07/26/2007 09:20 AM
Attachments: [ResponsetoComments7-24-07.pdf](#)
[Riverbank Soil Data.pdf](#)
[2ndquarter07.pdf](#)

Sean,

Attached for your information are the:

- Arkema upland quarterly progress report
- Riverbank soil data (sample location map is available in the work plan which is posted on the EPA web page)
- Arkema response to DEQ/EPA comments on the Draft Groundwater Source Control Evaluation.

Regarding the Arkema responses to comments on their Draft Groundwater Source Control Evaluation, it is not my intention to provide a line-by-line response to Arkema. However, I do plan on sending them a letter which:

- Acknowledges receipt of their responses
- Informs them that we have forwarded their responses to EPA
- Notes that much of the content of LSS's 7/24/07 response needs to be resolved by the three parties (EPA/DEQ/LSS) in the context of the Early Action negotiations.
- Agrees that JSCS SLVs were not meant to be used as cleanup standards or RAOs. However, EPA is viewing them as preliminary RAOs for the purposes of this Early Action. Therefore, because of the EA schedule and scope, DEQ expects LSS to carry any on-site groundwater exceedances of SLVs into the groundwater FFS. Given, EPA's position, the groundwater FFS should use the SLVs as design criteria, etc. although the SLVs may not end up being the final RAOs or compliance standards.
- DEQ has verbally advised SLLI that they need to evaluate options for and implement source control for their groundwater plume migrating onto the Arkema property on a schedule compatible with Arkema EA (We also advised SLLI that a letter from EPA to this effect was pending).

I believe the DEQ/EPA May 2007 letter was pretty clear regarding our expectations for the groundwater FFS. I am going to leave it to EPA to incorporate the source control issues raised by LSS in their responses into the ongoing EE/CA negotiations.

Sean, give me a call if you want to discuss.

Matt

-----Original Message-----

From: Todd SLATER [mailto:todd.slater@total.com]

Sent: Tuesday, July 24, 2007 11:24 AM

To: MCCLINCY Matt

Subject: Quarterly Report and Response to JSCS Comments

Matt,

Attached is the Quarterly Report with the River Bank Soil data. I thought I had sent this out last week but apparently it didn't go. Also, attached are the responses to comments on the JSCS screening evaluation for groundwater.

Todd

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